

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

_____)	
UNITED STATES OF AMERICA)	
)	No. 04-CR-10298-DPW
)	
)	
MARKO BOSKIC)	
_____)	

**DEFENDANT MARKO BOSKIC'S MOTION FOR DISCOVERY
RELATED TO HIS MOTION TO SUPPRESS EVIDENCE**

Defendant Marko Boskic moves that the Court order the Government to provide him with the name, address, title and agency affiliation or each person who was involved in the planning for the defendant's arrest and interrogation which took place on August 25, 2004.

In support thereof the defendant says as follows:

1. The defendant has filed a motion to suppress the statements which he gave to investigators on August 25, 2004.
2. The defendant is entitled to an evidentiary hearing.
3. For reasons that are fully set forth in the memorandum in support of the motion, the defendant is entitled to show at the hearing that the Government planned in advance to question him under circumstances in which the true nature of the investigation was misrepresented, and that it deliberately delayed execution of an arrest warrant in order to obtain his statement.
4. Defendant intends to call as a witness at the evidentiary hearing on that motion, every person who was involved in the planning of this event.

5. Defendant needs the requested information in order to issue subpoenas for the hearing.

Respectfully submitted,

/s/ Max D. Stern

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